

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION**

BERNHARDT TIEDE, II; §
TEXAS PRISONS COMMUNITY §
ADVOCATES; DISABILITY RIGHTS §
TEXAS; BUILD UP, INC. a/k/a LIONESS: §
JUSTICE IMPACTED WOMEN'S §
ALLIANCE; and COALITION FOR TEXANS §
WITH DISABILITIES, §
§
Plaintiffs, §
v. §
§
BRYAN COLLIER, in his official capacity as §
Executive Director of Texas Department of §
Criminal Justice, §
§
Defendant. §
§

Civil Action No.: 1:23-cv-01004-RP

**PLAINTIFFS' SECOND AMENDED LIST OF EXHIBITS
FOR PRELIMINARY INJUNCTION HEARING**

Tiede v. Collier – Plaintiffs' Second Amended List of Exhibits for Preliminary Injunction Hearing

Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
1	<i>Development of Heat Pyrexia</i> by Joseph Gold (July 16, 1960)			
2	<i>Acute Heat Stroke: Epidemiologic, Biochemical, Renal, and Coagulation Studies</i> by Thomas F. O'Donnell, Jr. (Nov. 24, 1975)			
3	<i>Morbidity and Mortality Associated With the July 1980 Heat Wave in St. Louis and Kansas City, MO</i> by Stephen Jones (June 25, 1982)			
4	<i>Extreme High-Temperature Events: Changes in Their Probabilities with Changes in Mean Temperature</i> by Mearns, Katz and Schneider (Dec. 1, 1984)			
5	<i>Heat-Related Illnesses and Deaths — United States, 1994–1995</i> by MWWR (June 30, 1995)			
6	<i>Heat-Related Deaths During the July 1995 Heat Wave in Chicago</i> by Jan C. Semenza (July 11, 1996)			
7	<i>Heat-Related Death and Mental Illness During the 1999 Cincinnati Heat Wave</i> by Reinhard Kaiser, et al. (Sept. 3, 2001)			
8	<i>Southern Medical Journal: Drug-Associated Heat Stroke</i> (August 1, 2022)			
9	<i>Future Climate: What We Know, What We Don't Know</i> by Linda O. Mearns (Oct. 10, 2002)			

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10	<i>Changing Heat-Related Mortality in the United States</i> by Robert E. Davis (Nov. 1, 2003)			
11	<i>Excessive Heat Events Guidebook</i> as published by the U.S. EPA Office of Atmospheric Programs (March 1, 2006)			
12	<i>Dividing the Waters – High Resolution Climate Scenarios</i> by L. O. Mearns (May 14, 2007)			
13	<i>Prognostic Factors in Heat Wave-Related Deaths: A Meta-Analysis</i> by Abderrezak Bouchama (Nov. 12, 2007)			
14	<i>Drug-Induced Hyperhidrosis and Hypohidrosis</i> by William P. Cheshire, Jr., et al. (2008)			
15	<i>The 2006 California Heat Wave: Impacts on Hospitalizations and Emergency Department Visits</i> by Kim Knowlton (Jan. 1, 2009)			
16	<i>Heat-Related Illnesses During the 2003 Heat Wave in an Emergency Service</i> by M. Oberlin, et al. (July 8, 2009)			
17	<i>The Effects of Temperature and Use of Air Conditioning on Hospitalizations</i> by Ban Ostro (Sept. 9, 2010)			
18	<i>The Impact of Extreme Heat on Morbidity in Milwaukee, Wisconsin</i> by Bo Li, et al. (June 8, 2011)			

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19	Temperature Log from the Texas Department of Criminal Justice's Hutchins Unit (July 15, 2011)			
20	<i>Diagnosis and Treatment of Drug-Induced Hyperthermia</i> by Megan E. Musselman, et al. (Jan. 1, 2013)			
21	Deposition of Roy Storie in <i>McCollum v. Livingston</i> , No. 312-cv-02037, USDC ND TX (March 4, 2014)			
22	<i>Identifying Individual Risk Factors and Documenting the Pattern of Heat-Related Illness through Analyses of Hospitalization and Patterns of Household Cooling</i> by Michael T. Schmeltz (March 5, 2015)			
23	<i>Multiple Trigger Points for Quantifying Heat-Health Impacts: New Evidence from a Hot Climate</i> by Diana B. Petitti (Feb. 1, 2016)			
24	National Weather Service Heat Index Chart (Feb. 26, 2016)			
25	Deposition of Bryan Collier in <i>McCollum v. Livingston</i> , No. 414-cv-3253 in the USDC SD TX (March 30, 2016)			
26	Testimony of Susanna Vassallo in <i>Bailey v. Livingston</i> , No. 414-cv-01698, USDC SD TX (June 1, 2016)			
27	Testimony of Phyllis McWhorter in <i>Cole v. Collier</i> , No. 414-cv-1698, USDC SD TX (June 23, 2017)			

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Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
28	Old Autopsies, Part 1 (filed June 29, 2017)			
29	Old Autopsies, Part 2 (filed June 29, 2017)			
30	Orders and Discovery Responses, <i>Webb v. Livingston, Cole v. Livingston, and Cole v. Collier</i>			
31	Texas Department of Criminal Justice's Health Services Liaison Facility Types List			
32	<i>“Cooking Them to Death” The Lethal Toll of Hot Prisons</i> by Maurice Chammah (Oct. 11, 2017)			
33	<i>Risk Characterization of Hospitalizations for Mental Illness and/or Behavioral Disorders with Concurrent Heat-Related Illness</i> by Michael T. Schmeltz, et al. (Oct. 16, 2017)			
34	<i>Interim Report 2018</i> by the House Committee on Corrections of the Texas House of Representatives (Nov. 16, 2018)			
35	<i>Influence of Heat Waves on Daily Hospital Visits for Mental Illness in Jinan, China – A Case-Crossover Study</i> by Xuena Liu, et al. (Dec. 30, 2018)			
36	<i>Correctional Managed Health Care Policy Manual, Heat Stress, D-27.2, Effective Date 05/28/2019</i> , as published by the Texas Department of Criminal Justice (May 28, 2019)			

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Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
37	TBCJ 205 th Meeting Minutes (June 21, 2019)			
38	Hearing transcript, <i>Cole v. Collier</i> (Sept. 10, 2019)			
39	<i>Guidelines for Completing the Health Summary for Classification Form Policy A-08.4, Attachment A</i> , as published by the Texas Department of Criminal Justice (Nov. 5, 2019)			
40	TDCJ's Seasonal Preparedness Memos and Communications, Mr. Collier's Response to RFP # 4			
41	TBCJ 208 th Meeting Minutes (Dec. 12, 2019)			
42	<i>Heat-Related Deaths – United States, 2004-2018</i> by Ambarish Vaidyanathan (June 19, 2020)			
43	<i>The Implications of Hypothalamic Abnormalities for Schizophrenia</i> by Hans-Gert Bernstein, et al. (2021)			
44	<i>Use of Multiple Anticholinergic Medications Can Predispose Patients to Severe Non-exertional Hyperthermia</i> by Ahila Manivannan, et al. (March 23, 2021)			
45	<i>After Sweltering Temperatures Killed Texas Prisoners, Lawmakers Vote to Install Air Conditioning</i> by The Texas Tribune (May 14, 2021)			

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Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
46	<i>Global, Regional, and National Burden of Mortality Associated with Non-Optimal Ambient Temperatures from 2000 to 2019: a Three-Stage Modelling Study</i> as published by the Lancet (July 1, 2021)			
47	<i>The Casual Effect of Heat on Violence: Social Implications of Unmitigated Heat Among the Incarcerated</i> by the National Bureau of Economic Research (July 1, 2021)			
48	TDCJ's Purchase Orders for Temporary Air Conditioning Units			
49	<i>Extreme Weather in Texas</i> by Texas A&M University (Oct. 7, 2021)			
50	<i>Antipsychotic Medication – Induced Hyperthermia Leading to Cerebrovascular Accident: A Case Report</i> by Karimah Best, et al. (Oct. 11, 2021)			
51	Michelle Deitch CV			
52	Correctional Managed Health Care Policy Manual No. H-65.1 (Nov. 22, 2021)			
53	Lioness Members Outside Data - AEO			
54	<i>Association of Extreme Heat With All-Cause Mortality in the Contiguous US, 2008-2017</i> by Sameed Ahmed			

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Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
55	<i>Extreme Temperatures and Covid19 in Texas Prisons</i> by J. Carlee Purdum, Ph.D. et al. (July 2022)			
56	<i>Temperatures Inside Texas Prison Units Regularly Reach 110 Degrees, new report says</i> by Claire Colbert (July 23, 2022)			
57	<i>Temperature Inside Baking Texas Prisons With No AC Regularly Hits 110 Degrees, Study Finds</i> by Josh Marcus (July 26, 2022)			
58	<i>Drug-Induced Hyperthermia Review</i> by Michael Horseman, et al. (July 26, 2022)			
59	<i>New Study Details How Extreme Heat is Affecting Texas Prisons</i> by Texas Standard (July 29, 2022)			
60	<i>Incarceration Rate Report – Highest and Lowest August 1, 2022</i> , published by the Texas Commission on Jail Standards (Aug. 1, 2022)			
61	<i>'I Thought I Was Going to Die There.' What's it's Like to Live with Rising Temperatures in Prison</i> by Hannah Grabenstein (Aug. 19, 2022)			
62	Lioness Members Inside Data - AEO			
63	Communications Between Dr. Dominick and Collier, TIEDE_DEF0110695 (Aug. 23, 2022)			

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Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
64	<i>In a Sweltering Texas Jail, Cool Towels but No Air-Conditioners</i> by NY Times (Aug. 26, 2022)			
65	TDCJ Fiscal Year 2023 Operating Budget (Aug. 26, 2022)			
66	<i>Heatwaves kill more Americans than hurricanes, tornadoes and floods</i> , published by The Economist (Sept. 3, 2022)			
67	<i>Preparing Patients with Serious Mental Illness for Extreme Heat</i> by Carol Lim, et a (Sept. 2022)			
68	TDCJ Joint Budget Hearing (Sept. 30, 2022)			
69	TBCJ 225 th Meeting Minutes (Oct. 14, 2022)			
70	<i>Provision of Air Conditioning and Heat-Related Mortality in Texas Prisons</i> and Supplement by Julianne Skarha et al. (Nov. 2, 2022)			
71	TX Prison Heat Averages 2022-2023			
72	<i>Statistical Report Fiscal Year 2023</i> as published by the Texas Department of Criminal Justice			
73	<i>2022 Associations Between Extreme Temperatures and Cardiovascular Cause-Specific Mortality: Results From 27 Countries</i> by Barrak Alahmad, et al. (Jan. 3, 2023)			

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74	TBCJ 227 th Meeting Minutes (Feb. 10, 2023)			
75	<i>Heat-Related Mortality in U.S. State and Private Prisons: A Case-Crossover Analysis</i> by Julianne Skarha et al. (March 1, 2023)			
76	<i>Schizophrenia Pinpointed as a Key Factor in Heath Deaths</i> by Warren Cornwall (March 17, 2023)			
77	Charlie Malouff Testimony for HB1355 (March 24, 2023)			
78	Charlie Malouff Testimony for HB2950 (March 24, 2023)			
79	Charlie Malouff Testimony for HB1708 (March 24, 2023)			
80	TBCJ 228 th Meeting Minutes (April 21, 2023)			
81	Picture of Mr. Bernhardt Tiede II (2023)			
82	TBCJ 229 th Meeting Minutes (June 23, 2023)			
83	<i>'Man Down!': Surviving the Texas Heat in Prisons Without Air-conditioning</i> by NY Times (June 29, 2023)			
84	Email from John Pulvino (UTMB) to TDCJ and TTUHSC entitled "June 23 Heat Injury Report," Bates No. TIEDE_DEF0107957 (June 30, 2023)			
85	Attachment to Pulvino Email, Entitled "Heat Related Illnesses Report," TIEDE_DEF0107958 (June 30, 2023)			

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86	<i>Inmates are Dying in Stifling Texas Prisons, but the State Seldom Acknowledges Heat as a Cause of Death by TEX. TRIBUNE (July 3, 2023)</i>			
87	<i>People in Prison Struggle to Survive Unrelenting Heat Without Air Conditioning by PBS News Weekend (July 15, 2023)</i>			
88	<i>Texas Says No Inmates Have Died Due to Stifling Heat in its Prisons Since 2012. Some Data May Suggest Otherwise, as published by CBS News</i>			
89	Email Complaint re: Hughes Unit Demonstrating How Staffing Issues Hurt Respite Access, TIEDE_DEF0109642 (July 19, 2023)			
90	<i>Texas Prisons Are Cooking People Alive. Are We Okay With That? Part 1 in a series about heat in prison, published by the Austin Chronicle (Aug. 11, 2023)</i>			
91	<i>Extreme Heat and Suicide Watch Incidents Among Incarcerated Men by David H. Cloud, et al. (Aug. 11, 2023)</i>			
92	<i>The State Claims No One Is Dying From 120+°F in Prisons, Part 2 The State's Response to the Prison Heat Crisis, published by the Austin Chronicle (Aug. 18, 2023)</i>			

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93	'Why Didn't They Just Kill Us?' Three Women Talk About Life in a Texas Prison Without AC by KUT News (Aug. 18, 2023)			
94	As the death toll in stifling Texas prisons climbs, congressional Democrats ask for investigation by Jodie McCullough (Aug. 21, 2023)			
95	Lobbying to Save Lives in Texas Prisons, It'll Cost \$500 Million to Get A/C in Prisons by Austin Chronicle (Aug. 25, 2023)			
96	Texas Inmates Using Toilet Water to Cool Off in Prisons Without A/C, According to Woman's Viral Testimony by WFAA (Aug. 29, 2023)			
97	Texas Congressman Calls for an Investigation as Prisoner Deaths Spike in Heat by NPR News (Sept. 4, 2023)			
98	Extreme Heat Can be a Death Sentence in Texas Prisons by Yale Climate Connections (Sept. 29, 2023)			
99	Incarcerated People Endure Sweltering Heat and Freezing Cold Inside Ill-Equipped Facilities by the 19 th (Oct. 5, 2023)			
100	Prisoners in 2022 – Statistical Tables as published by the United States Department of Justice, Bureau of Justice Statistics (November 2023)			

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Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
101	TDCJ Complaints and Policies re Temperature in TDCJ Facilities (Nov. 30, 2023)			
102	TDCJ Report “Monitoring of Temperature and Temperature-Related Deaths Fiscal Year 2023 Report” (Dec. 5, 2023)			
103	<i>Mental Illness and Increased Vulnerability to Negative Health Effects from Extreme Heat Events: A Systematic Review</i> by Julia Meadows, et al. (Dec. 15, 2023)			
104	Priya Banerjee, M.D. CV (January 2024)			
105	Linda Mearns CV (February 2024)			
106	Declaration of Antonella Zanobetti (April 10, 2024)			
107	Dean Williams CV			
108	Declaration of Dean Williams (April 11, 2024)			
109	Declaration of Linda Mearns (April 11, 2024)			
110	Declaration of Jennifer Toon (April 12, 2024)			
111	Resume of Charles A. Malouff, Jr., M.P.O.Ret.			
112	Declaration of Priya Banerjee (April 15, 2024)			
113	Declaration of Susi Vassallo (April 15, 2024)			

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Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
114	Susi Vassallo CV			
115	Declaration of Charlie Malouff (April 17, 2024)			
116	Declaration of Chase Bearden (April 17, 2024)			
117	Third Declaration of Jennette Cross, MD (April 18, 2024)			
118	Antonella Zanobetti, PhD. CV (April 22, 2024)			
119	Declaration of Brandon Duke (April 23, 2024)			
120	<i>Exceptional Heat of Summer 2023</i> as maintained by the National Weather Service			
121	<i>Heat Index</i> as maintained by the National Weather Service			
122	<i>TDCJ Air Conditioning Construction Projects</i> as maintained by the Texas Department of Criminal (April 17, 2024)			
123	<i>Texas Profile</i> as maintained by the Prison Policy Initiative			
124	<i>Unit Directory</i> as maintained by the Texas Department of Criminal Justice			
125	<i>What is the heat index</i> as maintained by the National Weather Service			

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Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
126	Plaintiff's First Set of Interrogatories to Defendant Bryan Collier in his Official Capacity (June 4, 2024)			
127	Plaintiff's First Set of Requests for Production to Defendant Bryan Collier in his Official Capacity (April 29, 2024)			
128	High Value Data Sets			
129	Subpoena Return for Texas Department of Criminal Justice Hospital			
130	Subpoena Return for University of Texas Medical Branch – Texas Department of Criminal Justice			
131	Jhilam Biswas CV (May 13, 2024)			
132	TDCJ Temperature Report FY2020, TIEDE DEF_17696			
133	Plaintiffs' Rule 30(b)(6) Notice of Deposition to the Texas Department of Criminal Justice			
134	Tex. Dep't State Health Services License Details for 301 University Blvd. Hospital			
135	TDCJ Hospital Website			
136	Julianne (Julie) Skarha CV			
137	Jason Wilson EMessaging (May 26, 2024 – July 8, 2024)			

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Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
138	Jason Wilson Letter and Grievance			
139	Defendant Collier's Responses to Plaintiff Tiede's First Set of Interrogatories (May 31, 2024)			
140	Defendant Collier's Responses to Plaintiff Tiede's First Set of Requests for Production, Bates Nos. TIEDE DEF_00087-13923 (May 31, 2024)			
141	Defendant's Objections and Responses to Plaintiff's First Set of Interrogatories (May 31, 2024)			
142	Defendant's Objections and Responses to Plaintiff's First Set of Requests for Production, Bates Nos. TIEDE DEF_00087-13923 (June 4, 2024)			
143	Second Declaration of Charlie Malouff (June 4, 2024)			
144	Second Declaration of Amite Dominick (June 6, 2024)			
145	Second Declaration of Jennifer Toon (June 6, 2024)			
146	TPCA's Mailing List of Individuals Incarcerated in TDCJ Facilities			
147	Examples of More than 25 Official TPCA Team Member Incarcerated Volunteers			
148	T.X. CURE Inmate Master Mailing List			

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Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
149	Email from K. Blifford to C. Vega re: McConnell Lockdown and Issues with Respite Area Access, TIEDE_DEF0110764 (June 24, 2024)			
150	TDCJ Air Conditioning Construction Projects			
151	Letter from Billy Mitchell to Charlie Malouff (July 1, 2024)			
152	Wilson – Custodial Death Report (July 11, 2024)			
153	Regional Fact Sheet North and Central America			
154	<i>Humane Temperatures Potential Cost Savings Report</i> by TPCA			
155	Odis Banks Death Investigation Materials			
156	Jose Barajas Death Investigation Materials			
157	Mario Benitez Death Investigation Materials			
158	Adam Birchprice Death Investigation Materials			
159	Randy Butler Death Investigation Materials			
160	James Cardona Death Investigation Materials			
161	John Castillo Death Investigation Materials			
162	Christopher Chavez Death Investigation Materials			

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Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
163	Clifton Choyce Death Investigation Materials			
164	Diego Duenas Death Investigation Materials			
165	Jordan Dupree Death Investigation Materials			
166	Robert Evitts Death Investigation Materials			
167	Lakeith Ford Death Investigation Materials			
168	Armando Gonzales Death Investigation Materials			
169	Elizabeth Hagerty Death Investigation Materials			
170	Adrian Hayward Death Investigation Materials			
171	Carlos Hernandez Death Investigation Materials			
172	Clifford Hill Death Investigation Materials			
173	John Hurst Death Investigation Materials			
174	Michael Ingram Death Investigation Materials			
175	Antonio Ishmon Death Investigation Materials			
176	Marshall Isome Death Investigation Materials			
177	Anthony Jennings Death Investigation Materials			
178	Brian Loud Death Investigation Materials			
179	Marcus Lumpkins Death Investigation Materials			

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Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
180	Iram Maynez Death Investigation Materials			
181	Michael McCann Death Investigation Materials			
182	Paul Morales Death Investigation Materials			
183	Joel Morris Death Investigation Materials			
184	Jamie Nonn Death Investigation Materials			
185	Andres Ortiz Death Investigation Materials			
186	Stephen Pardue Death Investigation Materials			
187	Michael Peek Death Investigation Materials			
188	Peyton Pendley Death Investigation Materials			
189	Paul Rojas Death Investigation Materials			
190	Eddie Sanchez Death Investigation Materials			
191	John Skinner Death Investigation Materials			
192	Jon Anthony Southards Death Investigation Materials			
193	Cantrell Spears Death Investigation Materials			
194	Arelandis Spiller Death Investigation Materials			
195	Johnny Teeters Death Investigation Materials			
196	Olga Torres Death Investigation Materials			
197	Allen Turner Death Investigation Materials			

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Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
198	Adam Williams Death Investigation Materials			
199	Clint Wilson Death Investigation Materials			
200	Patrick Womack Death Investigation Materials			
201	Marvin Wyatt Death Investigation Materials			
202	Juan Young Death Investigation Materials			
203	Collier's Response to Interrogatory No. 2, <i>Webb v. Livingston</i> (January 30, 2017)			
204	Mr. Collier's Response to Interrogatory No. 2, <i>Tiede v. Collier</i> (July 15, 2024)			
205	Mr. Collier's Response to Interrogatory No. 6, <i>Tiede v. Collier</i> (July 15, 2024)			
206	Inmate and Employees Heat-Related Illnesses Mr. Collier's Responses to Interrogatory Nos. 8 & 9, <i>Tiede v. Collier</i> (July 15, 2024)			
207	Spreadsheet of TDCJ Employees' Workers' Compensation Complaints, Mr. Collier's Response to Interrogatory No. 10, <i>Tiede v. Collier</i> (July 15, 2024)			
208	Bernhardt Tiede's Housing Placements, Mr. Collier's Response to Interrogatory No. 15, <i>Tiede v. Collier</i> (July 15, 2024)			

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Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
209	TDCJ's Livestock Management Policies, Mr. Collier's Response to Request for Production No. 17, <i>Tiede v. Collier</i> (July 15, 2024)			
210	Bernhardt Tiede's Medical Records, Mr. Collier's Response to Request for Production No. 20, <i>Tiede v. Collier</i>			
211	Inmates' Lawsuits re: Heat-Related Issues, Mr. Collier's Response to Request for Production No. 21, <i>Tiede v. Collier</i>			
212	Audio File – J. Wilson Hang up (July 7, 2024)			
213	Audio File – J. Wilson Request for Check (July 7, 2024)			
214	Audio File – Follow up call on WC (July 7, 2024)			
215	Appropriations Committee—S/C on Arts. I, IV, & V (Feb. 14, 2019)			
216	Corrections Committee Collier Testimony (March 21, 2019)			
217	Collier Testimony to Texas State House Committee on Corrections (April 21, 2021)			
218	87th Legislature Corrections Committee (Sept. 27, 2021)			
219	Appropriations Committee Hearing (July 12, 2022)			

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220	TDCJ Public Information Request (Aug. 31, 2023)			
221	Letter from Elizabeth Guthrie to Lioness (May 28, 2024)			
222	Letter from Samantha Rodman to Lioness (June 10, 2024)			
223	Mr. Collier’s Heat-Related Meetings, Mr. Collier’s Response to Request for Production No. 5, <i>Tiede v. Collier</i>			
224	TDCJ’s Temperature Reports, Mr. Collier’s Responses to Request for Production Nos. 7, 8, 10, <i>Tiede v. Collier</i>			
225	Clifton Buchanan and Dr. Carlee Purdum Testimony at House Appropriations Committee (July 12, 2022)			
226	Collier Testimony at House Appropriations Committee (July 12, 2022)			
227	TDCJ’s Cost Estimates, Mr. Collier’s Response to Request for Production No. 14, <i>Tiede v. Collier</i>			
228	Heat-Related Grievances, Mr. Collier’s Response to Request for Production No. 15, <i>Tiede v. Collier</i>			
229	Heat-Related WC Complaints, Mr. Collier’s Response to Request for Production No. 24, <i>Tiede v. Collier</i>			
230	TDCJ Temperature Logs			
231	Sanctions Order, <i>Cole v. Collier</i> (Dec. 11, 2019)			

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232	Heat Preparedness Posters and Pocket Card			
233	TDCJ Heat Related Illness Video (2017)			
234	TDCJ Heat Related Illness Video (2014)			
235	TDCJ Heat Related Illness Patient Education Video			
236	TDCJ Seasonal Preparedness Memos			
237	Dr. Jeanette Cross CV			
238	Picture of Mr. Bernhardt Tiede II 2016			
239	Tiede OAG Medical Records (2023)			
240	Tiede Huntsville Memorial Medical Records			
241	Video of Mr. Tiede 1			
242	Video of Mr. Tiede 2			
243	Video of Mr. Tiede 3			
244	Video of Mr. Tiede 4			
245	Video of Mr. Tiede 5			
246	Video of Mr. Tiede 6			
247	Video of Mr. Tiede 7			
248	Video of Mr. Tiede 8			
249	Video of Mr. Tiede 9			
250	Emailed Attachments from A. Carter			
251	Paul S. Uribe, M.D. CV			

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Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
252	Luis Sanchez Death Investigation Materials			
253	Marcus Lumpkins Death Investigation Materials			
254	Mr. Collier's Responses to Plaintiffs' First Set of Interrogatories (July 22, 2024)			
255	Official Transcript of TDCJ Rule 30(b)(6) Witness David Sweetin (July 25, 2024)			
256	Order for Preliminary Injunction, <i>Cole v. Livingston</i> (June 21, 2016)			
257	Memorandum and Order Granting Class Certification, <i>Cole v. Livingston</i> (Jan. 22, 2016)			
258	Memorandum and Opinion regarding Preliminary Injunction, <i>Cole v. Collier</i> (July 19, 2017)			
259	Memorandum and Order regarding Sanctions, <i>Cole v. Collier</i> (Dec. 11, 2019)			
260	TDCJ's Second Supplemental Responses to Webb's First Set of Interrogatories, <i>Webb v. Livingston</i> (June 29, 2017)			
261	TDCJ's Third Supplemental Responses to Webb's First Set of Interrogatories, <i>Webb v. Livingston</i> (June 29, 2017)			
262	Mr. Collier's Responses to Plaintiff's First Set of Requests for Production (July 22, 2024)			

Tiede v. Collier – Plaintiffs' Second Amended List of Exhibits for Preliminary Injunction Hearing

Exhibit No.	Description of Exhibit	Stip.	Obj.	Date Admitted
263	Declaration of Dr. Jeanette Cross with Attachments (Aug. 29, 2023)			
264	Messages between Brittany Robertson and Jason Lee Wilson (May-July 2024)			
265	Email from Kate Blifford to Bryan Collier, <i>et al.</i> (July 11, 2022)			
266	Texas Department of Criminal Justice Self-Evaluation Report (August 31, 2023)			
267	<i>KCBD Investigates: TDCJ requests millions in funding to help with staffing crisis</i> (Oct. 12, 2022)			
268	TDCJ Report Temperatures and Temperature Related Deaths FY 22			
269	Texas Prison Letter from Christopher Flores (July 22, 2024)			
270	TDCJ Report Monitoring of Temperatures and Temperature Related Deaths FY 21			
271	Email to Brad Livingston from Lannette Linthicum (June 26, 2009)			

DATED this 30th day of July, 2024.

Respectfully submitted,

/s/ Kevin D. Homiak

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CERTIFICATE OF SERVICE (CM/ECF)

I HEREBY CERTIFY that on July 30, 2024, I served the foregoing on all counsel of record through the court's CM/ECF e-filing system.

/s/ Kevin D. Homiak

Kevin D. Homiak